

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**ROGER KNOX, WINTERCAP S.A.,  
MICHAEL T. GASTAUER, WB21 US  
INC., SILVERTON SA INC., WB21 NA  
INC., C CAPITAL CORP., WINTERCAP  
SA INC. AND B2 CAP INC.**

**Defendants.**

**RAIMUND GASTAUER, SIMONE  
GASTAUER FOEHR, B21 LTD.,  
SHAMAL INTERNATIONAL FZE, AND  
WB21 DMCC**

**Relief Defendants.**

**18-CV-12058-RGS**

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENTS AGAINST DEFENDANTS  
WB21 US INC., SILVERTON SA INC., WB21 NA INC., C CAPITAL CORP.,  
WINTERCAP SA INC., AND B2 CAP INC.**

Pursuant to Fed. R. Civ. P. 55(b)(2), plaintiff Securities and Exchange Commission ("the Commission") hereby moves for entry of default judgment as to defendants WB21 US Inc., Silverton SA Inc., WB21 NA Inc., C Capital Corp., Wintercap SA Inc., and B2 Cap Inc.

In support of this motion, the Commission submits the accompanying memorandum of law and a declaration by Trevor Donelan with Exhibits A-G. Also filed herewith are proposed forms of Final Judgment as to each of the defendants against whom a default judgment is sought.

WHEREFORE, the Commission respectfully requests that the Court enter the proposed Final Judgments against each of WB21 US Inc., Silverton SA Inc., WB21 NA Inc., C Capital Corp., Wintercap SA Inc., and B2 Cap Inc.

December 3, 2018

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION  
By its attorneys,

/s/ Kathleen Shields

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#### **CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

The undersigned was unable to confer with defendants WB21 US Inc., Silverton SA Inc., WB21 NA Inc., C Capital Corp., Wintercap SA Inc., and B2 Cap Inc. because they are not represented by counsel and no individual has been authorized to represent them in this matter.

/s/ Kathleen Shields

Kathleen Shields

#### **CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2018, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. A copy will also be sent via first class mail and/or email to those parties who have not yet registered for notice via the Court's CM/ECF system.

/s/ Kathleen Shields

Kathleen Shields